

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Robert Dedmon,	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO. 4:21-cv-03371
	§	
vs.	§	Jury Demand
	§	
Shell Exploration & Production	§	
Company and Shell Trading	§	
Services Company,	§	
	§	
<i>Defendants.</i>	§	

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**UNOPPOSED MOTION TO AMEND [EXTEND] THE SUMMARY  
JUDGMENT BRIEFING SCHEDULE FOR RESPONSE AND REPLY**

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**NATURE AND STAGE OF PROCEEDING**

**Case alleging national unlawful employment practice and ongoing discrimination.**

This is an unlawful employment practices case. It involves claims for race and color discrimination. It alleges a national unlawful pay practice dating back to at least 2014 and ongoing discrimination concerning pay and job grades.

**Summary judgment.** This motion seeks to extend through November 8, 2024 the deadline to file a response to Defendants' Motion for Summary Judgment [ECF No. 33]. The current response deadline is November 7, 2024 [ECF No. 38]. To be fair to defense

and honor our agreement on the issue, this motion also seeks to extend the current reply brief deadline through December 3, 2024.

#### **STATEMENT OF FACTS NECESSARY TO RESOLVE MOTION**

Defendants do not oppose the relief requested in this motion. Plaintiff Robert Dedmon — through undersigned counsel — seeks to extend through November 8, 2024 the deadline to file a response to Defendants' Motion for Summary Judgment [ECF No. 33]. Lead counsel Amy Gibson was sick with high fever last weekend and is still having fatigue and unable to work as long or as well as normal, plus other symptoms. Even with help from attorneys David Wiley and Amanda Hernandez, an additional day is needed to complete the response. To be fair to defense and honor our agreement on the issue, this motion also seeks to extend the current reply brief deadline through December 3, 2024.

#### **STATEMENT OF ISSUE AND STANDARD**

**Issue.** The issue before the Court is whether to grant an unopposed request to extend the summary judgment response deadline by one day and to correspondingly extend the reply brief deadline while accounting for the upcoming holiday.

**Standard.** The Court may extend the summary judgment response and reply deadlines for good cause under Federal Rule of Civil Procedure 6(b)(1)(a).

### **ARGUMENT**

The Court may extend the summary judgment response and reply deadlines for good cause under Federal Rule of Civil Procedure 6(b)(1)(a).<sup>1</sup> As shown in the statement of facts above, good cause is shown for the requested extensions of time.

### **RELIEF REQUESTED**

For good cause shown above, Plaintiff Robert Dedmon — through undersigned counsel — respectfully requests that the Court extend the deadline to file a response to Defendants' motion for summary judgment through and including November 8, 2024 and extend the deadline to file a reply brief through and including December 3, 2024.

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<sup>1</sup> Federal Rule of Civil Procedure 6(b)(1)(a) states in relevant part:

(b) EXTENDING TIME.

(1) In General. When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires;

Respectfully submitted,

*/s/ Amy Gibson*

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**CERTIFICATE OF CONFERENCE**

The undersigned certifies the following. She communicated with Defendants' counsel Marlene Williams about the relief requested in the motion. Ms. Williams informed her that Defendants do not oppose the relief requested in this motion.

*/s/ Amy Gibson*

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Amy E. Gibson

**CERTIFICATE OF COMPLIANCE**

The following is based on the word-count tool in the most current version of Microsoft® Word for Mac. The undersigned certifies that the foregoing *unopposed motion* contains 775 words, *including* the case caption, footnotes, the signature block, and all certificates.

*/s/ Amy Gibson*

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Amy E. Gibson

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on November 7, 2024, she filed the foregoing *unopposed motion* with the United States District Court for the Southern District of Texas through the CM/ECF system, such that the Shell Defendants should be served with a copy of the filed document as follows:

**VIA CM/ECF SYSTEM**

Ms. Marlene C. Williams  
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*/s/ Amy Gibson*

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